

EXHIBIT A

PROPOSED AGENDA

- I. Identification and Selection of Parties' Leadership**
- II. Adoption of Protective order / Rule 502 Order**
- III. ESI Protocol**
- IV. Use of Profile Forms or Fact Sheets**
- V. Handling of Advanced Cases**
- VI. Particular Issues That Should Be Resolved Early**
 - A. Lehmann Report
 - B. Privilege Logs
 - C. Preservation of Documents and Electronically Stored Evidence
- VII. Scope of Additional Discovery**
- VIII. Discovery Schedule**
- IX. Coordination with State Court Litigation**
- X. Future Conference(s)**